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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLINE DACOSTA, as Personal	:	
Representative and Administratrix for the	:	
Estate of JOSE L. DACOSTA, JR.	:	
VS.	:	C.A. NO. 04CV12059 JLT
CPR FISHING, INC.	:	
PEARL BEAUVAIS, as Personal	:	
Representative and Administratrix for the	:	
Estate of JOHN BEAUVAIS	:	
VS.	:	C.A. NO. 04-12057 NG
CPR FISHING, INC.	:	

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S
MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

In support of its motion to compel answers to interrogatories, the defendant states that the plaintiff, Caroline DaCosta has failed to timely respond or object to the defendant's interrogatories. Accordingly, the defendant pray that the plaintiff be compelled to file answers to interrogatories within twenty (20) days of the date of this court's order.

DEFENDANT,
By its Attorney,



J. Renn Olenn, Esq. #642090
OLENN & PENZA, LLP
530 Greenwich Avenue
Warwick, RI 02886
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CERTIFICATION

I certify that I sent a true copy of the within on November 2, 2005 to:

Thomas J. Hunt, Esq.
18 North Water Street
New Bedford, MA 02740

Kendia Pascucci